

JAP:DAL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M-11-979**

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UNITED STATES OF AMERICA

- against -

C O M P L A I N T

PHILIP OKODUGHA,

(18 U.S.C. § 1546)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER RAY, being duly sworn, deposes and says that he is a Special Agent with the Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

On or about October 3, 2011, within the Eastern District of New York, the defendant PHILIP OKODUGHA, did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with DSS and have been so since January 2011. I am familiar with the facts and circumstances set forth below from my personal involvement in the investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

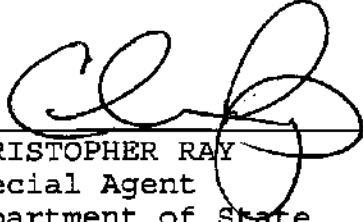
2. On or about October 3, 2011, the defendant PHILIP OKODUGHA, arrived at John F. Kennedy International Airport ("JFK") on Arik Airlines Flight HSY107, originating in Lagos, Nigeria. Upon arrival, Custom and Border Protection ("CBP") officers referred the defendant for secondary processing. In secondary, the defendant presented a Nigerian passport, number A02284634, which contained a United States B1/B2 visa, Visa Foil No. C7302843, Visa Control No. 20103476580002, issued in Abuja, Nigeria on or about December 15, 2010.

3. Upon questioning by CBP officers, the defendant PHILIP OKODUGHA, first claimed, in sum and substance, that he was in the United States for ten days in order to obtain medical treatment and to address a parking violation he had incurred during a prior trip to the United States.

4. Upon further questioning, the defendant admitted that he did not work for the employer listed on his visa application. The defendant further advised that, in order to obtain his visa, he had obtained fraudulent documents from a

contact in Nigeria falsely indicating that he worked for the employer listed on his visa application. The defendant admitted that he presented these documents as part of his visa application.

WHEREFORE, your deponent respectfully requests that the defendant PHILIP OKODUGHA, be dealt with according to law.

  
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CHRISTOPHER RAY  
Special Agent  
Department of State

Sworn to before me this  
3rd day of October, 2011

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UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK